

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Court  
Southern District of Texas  
FILED

APR 13 2015

David J. Bradley, Clerk of Court

United States of America  
v.  
Santos Alfonso Zamora-Salazar  
YOB: 1982

Case No.

4:15 MJ 442

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 6, 2015 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18, USC 922(g)(5)

Illegal Alien in Possession of a Firearm

This criminal complaint is based on these facts:

See Attachment Affidavit

☒ Continued on the attached sheet.

Approved by: Anibal J. Alaniz  
AUSA  
04-10-2015

  
Complainant's signature  
Jason Bean / Bureau of ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/13/2015

  
Judge's signature

City and state: Houston, Texas

Frances H. Stacy, U.S. Magistrate Judge

Printed name and title

## AFFIDAVIT

The affiant being duly sworn does depose and state the following:

1. That I, Jason Bean (the "affiant"), am currently employed as a Special Agent in the Bureau of Alcohol, Tobacco and Firearms & Explosives (ATF) and have been so since 2005. That during this time I have conducted and participated in numerous investigations concerning the illegal possession of firearms. In addition to the affiant's duties as a Special Agent, the affiant has acquired specialized knowledge and experience as to firearms and ammunition and the interstate nexus of firearms and ammunition, due to investigations, research, records, familiarity, conferring with other experts, training, teaching, and certifications.

2. This affidavit is made for the limited purpose of establishing probable cause in support of a Criminal Complaint alleging that on or about the 6<sup>th</sup> day of April, 2015, in the Southern District of Texas, SANTOS ALFONSO ZAMORA-SALAZAR did unlawfully possess a firearm that had previously traveled in and affected interstate commerce then being an alien illegally and unlawfully in the United States. Since this Affidavit is for the limited purpose of establishing probable cause to support the Criminal Complaint, it contains only a summary of relevant facts. I have not included each and every fact known to me concerning the entities, individuals, and the events described in this Affidavit.

3. The statements made in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided to me by other law enforcement officers; (c) criminal history records maintained by various law enforcement agencies such as the United States Department of Homeland Security & the National Criminal Information Center ("NCIC"); and (d) the training and experience of myself and other law enforcement agents and officers.

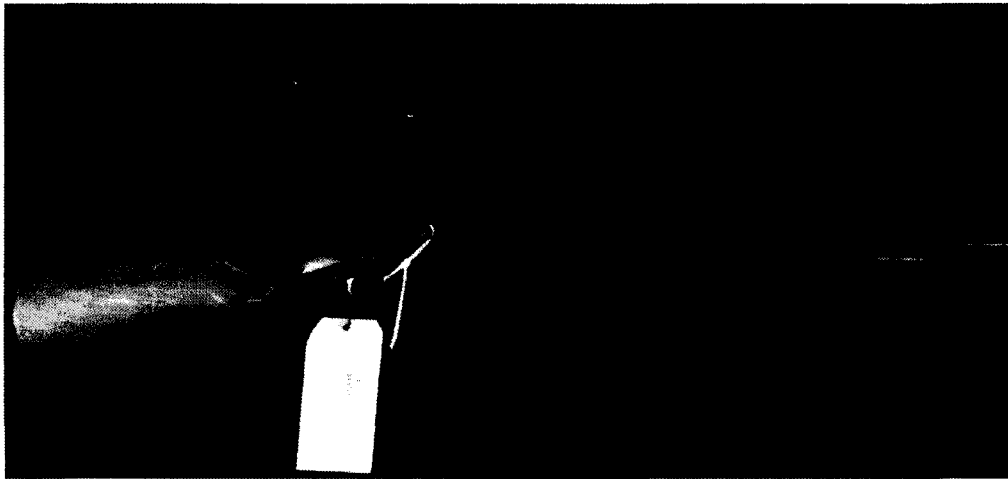
4. On April 6<sup>th</sup>, 2015, Special Agents of the United States Department of Homeland Security (DHS) and various other law enforcement agencies were conducting an investigation relative to a multi-kilogram methamphetamines trafficking organization operating in the Houston, TX area and being supplied out of Mexico.

5. During the course of the aforementioned investigation, Agents were conducting a controlled delivery operation involving the trafficking of approximately 6.76 kilograms of methamphetamines. Agents observed SANTOS ALFONSO ZAMORA-SALAZAR take possession of the package and deliver it to 1450 Warwick Rd., Houston, TX 77093, which was later determined to be the

home residence of SANTOS ALFONSO ZAMORA-SALAZAR. Based upon their investigation, agents and officers approached SANTOS ALFONSO ZAMORA-SALAZAR who fled on foot and was subsequently apprehended and detained.

6. According to Homeland Security Investigations (HSI) case agent Leo Gonzalez, SANTOS ALFONSO ZAMORA-SALAZAR was administered his Miranda warning and subsequently provided signed written consent to search his residence located at 1450 Warwick Rd., Houston, TX 77093. Subsequent to obtaining consent to search, agents located the following firearms:

- Mossberg shotgun (assembled by Maverick Arms), 12 Gauge, Unknown Model, Unknown serial number
- Marlin, Model 60, .22 Caliber, Rifle, Serial Number: 99189997



7. According to HSI case agent Leo Gonzalez, SANTOS ALFONSO ZAMORA-SALAZAR made post Miranda statements that the previously listed firearms belonged to him and that he had purchased the shotgun for \$300.00 from an individual that he identified as Jesus Ramos.

8. According to United States Department of Homeland Security records, SANTOS ALFONSO ZAMORA-SALAZAR is a previously deported alien illegally within the United States. A fingerprint analysis was completed to confirm this information.

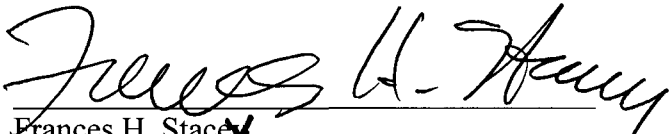
9. On April 9<sup>th</sup>, 2015, ATF Special Agent Jason Bean conducted an examination of the aforementioned firearms. Based upon his examination, the firearms are firearms as defined in Title 18, United States Code Chapter 44, Section 921(a)(3) and were not manufactured in the State of Texas.

10. That, to the best of the affiant's knowledge and belief, all statements made in this affidavit are true and correct. And that based on the foregoing facts, the affiant believes probable cause exists for the issuance of an arrest warrant for the person of SANTOS ALFONSO ZAMORA-SALAZAR for violation of Title 18, United States Code, Section 922(g)(5) Illegal Alien in Possession of a Firearm.

  
\_\_\_\_\_  
Jason Bean  
ATF  
Special Agent

Sworn to and subscribed before me this 13 day of April, 2015 and I

find probable cause.

  
\_\_\_\_\_  
Frances H. Stacey  
UNITED STATES MAGISTRATE JUDGE